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BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Complaint on Sunday
and Holiday Collections

Docket No. C2001-1

MOTION OF THE UNITED STATES POSTAL SERVICE
FOR AN EXTENSION OF TIME TO RESPOND TO THE
CARLSON MOTION TO COMPEL ON DFC/USPS-19 - 21
(June 27, 2001)

On June 4, 2001, the Postal Service objected to DFC/USPS-19 - 21. Mr. Carlson sought an extension until June 26 to file his motion to compel. On that date, he filed a 23 page motion to compel. Under the rules, a response would normally be due on Tuesday, July 3. The Postal Service hereby requests an extension of time to respond to the motion until Monday, July 9.

This request is based on the following grounds. First, Mr. Carlson has apparently made use of the extension he sought to submit his pleading. The motion is lengthy, and covers a wide variety of issues. Second, a response will require coordination with postal personnel and officials at many levels, working at many locations. Such coordination is time consuming, particularly in periods around holidays and during which summer vacation absences are more prevalent. Third, due dates for many pending responses and pleadings on other discovery matters in this proceeding already fall within the next week. Last but not least, undersigned counsel will be out of the office this coming Friday and Monday, and will be in mandatory training most of the day on Friday, July 6.

Therefore, the Postal Service respectfully requests that the time for response to

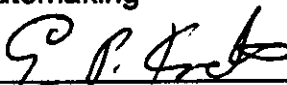
the June 26 motion to compel on DFC/USPS-19 - 21 be extended until Monday, July 9. Mr. Carlson has been contacted and does not oppose this motion, provided that the Postal Service will not oppose any motions for extension of other procedural deadlines he may need to file if caused by a delay in resolution of his motion to compel.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux
Chief Counsel
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Attorney

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon:

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